

COUNTY OF NUECES

STATE OF TEXAS

AFFIDAVIT OF JUSTIN L. WILLIAMS

BEFORE ME ON THIS THE 18 day of September 2018 personally appeared the affiant who being known to me after first being duly sworn did upon his oath state the following:

"My name is Justin L. Williams I am over the age of eighteen (18) years old and fully competent to swear to the items contained in my affidavit and swear to them from personal knowledge. I have been licensed to practice law and have continuously practiced in the State of Texas since 1983. I am licensed to practice in the Southern, Northern, Eastern and Western Districts of Texas as well as the Fifth Circuit Court of Appeals. I am also licensed to practice law in the State of North Dakota. I have practiced pro

I am the founding shareholder of Williams Attorneys PLLC. Prior to that time, I was a shareholder and founder of the Corpus Christi office of Cole, Easley, Sciba & Williams P. C. Before joining that firm, I was a partner in Hilliard Munoz Gonzales P. C. in Corpus Christi. From 1985-1999 I was an associate, partner then one of the four main shareholders in the Corpus Christi defense firm of Meredith, Donnell & Abernathy, P. C. I am board certified in Civil Trial Law and AV Preeminent rated by Martindale-Hubbell for over 30 years as well as recognized by multiple lawyer rating services such as Superlawyers, the million and multi-million dollars advocates, America's Top 100 High Stakes Litigators and the National Trial Lawyers Top 100 Trial Lawyers as well as a Lifetime Recipient of the Lawyers of Distinction and Best Attorneys in America Awards. I am former member of the Defense Research Institute and the Texas Association of Defense Counsel and since 2015 I have served as a Board Member of the Texas Trial Lawyers

Association, where I serve as a member of the membership and CLE committees. In 2018 my firm was recognized as the Best of the Best by the Victoria Advocate.

I and my firm have represented Pamala Alonzo since the onset of the arbitration filed over the non-compete by HHH. Because of the removal action filed by HHH along with their Motion to Stay filed in Federal Court, firm associate Ryan Williams has worked over 25 hours on this matter. Prior to joining Williams Attorneys PLLC Ryan was an associate at a Houston, Texas firm where he was billed at a rate of \$300 per hour. At Williams Attorneys PLLC, Ryan's billing rate for hourly matters is \$375/hour. In addition to Ryan Williams, firm associates Sean Williams and Nathan Clark have each worked 5 hours on this matter and each also bill at \$375/hour. Sean and Nathan's experience levels are similar to Ryan's. I have billed 10 hours on the response, emails, telephone calls and hearings associated with the removal of the case to Federal court. At this time in my career I do not accept hourly work and work strictly on a contingency. Any hourly work I accept would be at a rate of \$1,000 per hour, at which my firm would lose money. Based on my experience and trial schedule, along with the differences in hourly and contingency billing I have charged my time to this file at a rate of \$750/hour.

Ryan Williams 25 hours @ \$375/hour = \$9,375.00

Sean Williams 5 hours @ \$375/hour = \$1,875.00

Nathan Clark 5 hours @ \$375/hour = \$1,875.00

Justin L. Williams 10 hours @ \$750/hour = \$7,500.00

Total = \$20,625.00

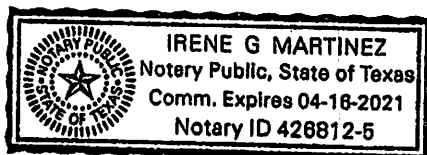
A total of \$20,625.00 has been spent in this matter by my firm. My firm specializes in multi-million-dollar contingency fee cases and the time spent on this matter has detracted from

time we would have spent on other cases that would have compensated the firm at a much higher rate. In my professional opinion, Ms. Alonzo would not have been able to afford a firm with the experience and quality attorneys as has worked on her case were it not for our representation in the whistleblower litigation of Ms. Alonzo and others. My firm has been forced to spend the time and effort outlined in this affidavit because of Defendants filings. The time and charges are reasonable and necessary for the attorneys involved and the effort and response required. Because Williams Attorneys PLLC is a Plaintiffs firm that works almost one-hundred percent on contingency matters, the work on this case has been a collaborative effort by firm attorneys. No one attorney has the time to devote to this matter or can take the time away from his caseload to devote to this case. Part of the reason my firm has undertaken this case is the difference in the ability of HHH and their companies to employ attorneys who specialize in employment law and the inability of an employee like Pamala Alonzo to obtain the same quality legal counsel. I and my firm believe in the right to trial by jury and the constitutional right of each citizen to obtain a trial by a jury of their peers, overseen by a duly appointed Federal Judge or a Judge elected under the laws of the State of Texas. We do not believe arbitration to be a constitutional substitute to trial by jury so that our work on behalf of Ms. Alonzo is justified.

Further Affiant sayeth not."

Gustav L. Williams
Affiant

Sworn to and subscribed before me by Gustav Williams on 9.18
2018.



Irene G. Martinez
Notary Public in and for the State of Texas
My Commission expires: 04-16-2021